

APPENDIX

Exhibit No.	Beg Bates–End Bates	Description	Basis for Sealing
Army Documents			
DTX 1113	ARMY-ADS-0000245860 – ARMY-ADS-0000245871	Email (July 2, 2021) From: R. Davis To: K. Graves CC: L. Moody, G. Wood, J. Pollock, F. McGurren, C. Blackwell, et al. Subject: RE: [Non-DoD Source] National Media REA Privileged and Confidential Attach: DDB - OMD REA 2 Jul. 21 Exhibit 1; etc.	The United States requests that the highlighted text be redacted because it contains (a) personal Department of Defense identification numbers, which are used similarly to a social security number to identify persons, and in some cases their family members, eligible for benefits and services. Release of these numbers could expose these individuals to fraud, as these numbers can lead to access of other sensitive information (social security numbers, health information, and personal financial information of themselves and their family members) and (b) a personal phone number on ARMY-ADS-0000245868_009 which is not widely published or made available to the public and the disclosure on the public docket of which would expose the individuals concerned to harassment in their private life. <i>See</i> Decl. of J. Horning (Army) ¶ 4 (filed herewith).
DTX 1117	ARMY-ADS-0000182974 – ARMY-ADS-0000183078	Email (July 23, 2021) From: E. Bridenstine To: L. Morris, L. Hanaper, J. Crimmins, R. Green, et al. Subject: [Non-DoD Source] FY22	The United States requests that the highlighted text be redacted because it contains (a) personal Department of Defense identification numbers, which are used similarly to a social security

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		Upfront OCT- Nov. budgets Attach: 21 National Media Activity 1.2 Compo 1 Flowchart (June 2021), FY21 Paid National Media Tactical Recommendation, Upfront Overview 29 APR 2021	number to identify persons, and in some cases their family members, eligible for benefits and services. Release of these numbers could expose these individuals to fraud, as these numbers can lead to access of other sensitive information (social security numbers, health information, and personal financial information of themselves and their family members) and (b) a personal phone number on ARMY-ADS-0000245868_009 which is not widely published or made available to the public and the disclosure on the public docket of which would expose the individuals concerned to harassment in their private life. <i>See Decl. of J. Horning (Army) ¶ 4.</i>
DTX 1400-8	ARMY-ADS-0000043190 – ARMY-ADS-0000043204	Email (Attachment) (Nov. 30, 2022) From: C. Zavala To: R. Castro, L. Morris, M. Hamper, L. Craig, S. Stone CC: R. Green, A. Pospesl, N. Broler, et al. Subject: [Non-DoD Source] FY22 and FY23 Compo 1,2,3 AMEDD & Officer National Media Flowcharts - November'22 Issuance Attach: 22-NMTF Compo 2 Flowcharts & Change Tracker, etc.	The United States requests that the highlighted text be redacted because it contains charts with recent (Q2 2023 to Q1 2024) cost and pricing information about the Army's digital advertising spending, the disclosure of which would cause significant harm to the Army because it is commercially sensitive and not available to the general public. For example, if the redacted information on DTX 1400-8 (which is substantially similar to DTX 1400-9, DTX 1400-10, DTX 1400-11, and DTX 1400-12) were publicized, various platforms and companies would be able to see recent

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			data on how much the Army has spent for specific types of advertising. Making this information available on the public docket could prejudice the Army’s ability to conduct business, and, therefore, release of this data would reasonably be likely to harm the Army’s economic and business interest in its efforts to advertise opportunities to potential recruits. <i>See</i> Decl. of J. Horning (Army) ¶ 3.
DTX 1400-9	ARMY-ADS-0000043190 – ARMY-ADS-0000043204	Email (Attachment) (Nov. 30, 2022) From: C. Zavala To: R. Castro, L. Morris, M. Hamper, L. Craig, S. Stone CC: R. Green, A. Pospesel, N. Broler, et al. Subject: [Non-DoD Source] FY22 and FY23 Compo 1,2,3 AMEDD & Officer National Media Flowcharts - November'22 Issuance Attach: 22-NMTF Compo 2 Flowcharts & Change Tracker, etc.	The United States requests that the highlighted text be redacted because it contains charts with recent (Q2 2023 to Q1 2024) cost and pricing information about the Army’s digital advertising spending, the disclosure of which would cause significant harm to the Army because it is commercially sensitive and not available to the general public. For example, if the redacted information on DTX 1400-8 (which is substantially similar to DTX 1400-9, DTX 1400-10, DTX 1400-11, and DTX 1400-12) were publicized, various platforms and companies would be able to see recent data on how much the Army has spent for specific types of advertising. Making this information available on the public docket could prejudice the Army’s ability to conduct business, and, therefore, release of this data would reasonably be likely to harm the Army’s economic and

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			business interest in its efforts to advertise opportunities to potential recruits. <i>See</i> Decl. of J. Horning (Army) ¶ 3.
DTX 1400-10	ARMY-ADS-0000043190 – ARMY-ADS-0000043204	Email (Attachment) (Nov. 30, 2022) From: C. Zavala To: R. Castro, L. Morris, M. Hamper, L. Craig, S. Stone CC: R. Green, A. Pospesel, N. Broler, et al. Subject: [Non-DoD Source] FY22 and FY23 Compo 1,2,3 AMEDD & Officer National Media Flowcharts - November'22 Issuance Attach: 22-NMTF Compo 2 Flowcharts & Change Tracker, etc.	The United States requests that the highlighted text be redacted because it contains charts with recent (Q2 2023 to Q1 2024) cost and pricing information about the Army's digital advertising spending, the disclosure of which would cause significant harm to the Army because it is commercially sensitive and not available to the general public. For example, if the redacted information on DTX 1400-8 (which is substantially similar to DTX 1400-9, DTX 1400-10, DTX 1400-11, and DTX 1400-12) were publicized, various platforms and companies would be able to see recent data on how much the Army has spent for specific types of advertising. Making this information available on the public docket could prejudice the Army's ability to conduct business, and, therefore, release of this data would reasonably be likely to harm the Army's economic and business interest in its efforts to advertise opportunities to potential recruits. <i>See</i> Decl. of J. Horning (Army) ¶ 3.
DTX 1400-11	ARMY-ADS-0000043190 – ARMY-ADS-0000043204	Email (Attachment) (Nov. 30, 2022) From: C. Zavala	The United States requests that the highlighted text be redacted because it

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		<p>To: R. Castro, L. Morris, M. Hamper, L. Craig, S. Stone CC: R. Green, A. Pospesel, N. Broler, et al. Subject: [Non-DoD Source] FY22 and FY23 Compo 1,2,3 AMEDD & Officer National Media Flowcharts - November'22 Issuance Attach: 22-NMTF Compo 2 Flowcharts & Change Tracker, etc.</p>	<p>contains charts with recent (Q2 2023 to Q1 2024) cost and pricing information about the Army's digital advertising spending, the disclosure of which would cause significant harm to the Army because it is commercially sensitive and not available to the general public. For example, if the redacted information on DTX 1400-8 (which is substantially similar to DTX 1400-9, DTX 1400-10, DTX 1400-11, and DTX 1400-12) were publicized, various platforms and companies would be able to see recent data on how much the Army has spent for specific types of advertising. Making this information available on the public docket could prejudice the Army's ability to conduct business, and, therefore, release of this data would reasonably be likely to harm the Army's economic and business interest in its efforts to advertise opportunities to potential recruits. <i>See</i> Decl. of J. Horning (Army) ¶ 3.</p>
DTX 1400-12	ARMY-ADS-0000043190 – ARMY-ADS-0000043204	<p>Email (Attachment) (Nov. 30, 2022) From: C. Zavala To: R. Castro, L. Morris, M. Hamper, L. Craig, S. Stone CC: R. Green, A. Pospesel, N. Broler, et al. Subject: [Non-DoD Source] FY22 and FY23 Compo 1,2,3 AMEDD & Officer National Media Flowcharts -</p>	<p>The United States requests that the highlighted text be redacted because it contains charts with recent (Q2 2023 to Q1 2024) cost and pricing information about the Army's digital advertising spending, the disclosure of which would cause significant harm to the Army because it is commercially sensitive and not available to the general public. For</p>

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		November'22 Issuance Attach: 22-NMTF Compo 2 Flowcharts & Change Tracker, etc.	example, if the redacted information on DTX 1400-8 (which is substantially similar to DTX 1400-9, DTX 1400-10, DTX 1400-11, and DTX 1400-12) were publicized, various platforms and companies would be able to see recent data on how much the Army has spent for specific types of advertising. Making this information available on the public docket could prejudice the Army's ability to conduct business, and, therefore, release of this data would reasonably be likely to harm the Army's economic and business interest in its efforts to advertise opportunities to potential recruits. <i>See</i> Decl. of J. Horning (Army) ¶ 3.
Navy Documents			
DTX 1069	NAVY-ADS-0000174029 – NAVY-ADS-0000174060	Email (Feb. 24, 2021) From: A. Owens To: A. Owens Subject: January EOM Analytics Report Attach: EOM Analytics Assessment January 2021	The United States requests that the highlighted text be redacted because it contains an email sent by Allen Owens using his personal email address and including the personal email address of another individual working at NRC. Personal email accounts are only used by Navy personnel when NMCI (Navy VPN) is unavailable. Personal email account information for Navy staff included in the documents cited in this Declaration would be redacted if produced in response to a Freedom of Information Act (FOIA) request and is not widely published or available to the

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			<p>general public as a matter of course. Making it available to the public threatens efficient agency operations as disclosure would expose the owners of the account to spam, spear-fishing, spoofing, or pharming attacks to these individuals' accounts. <i>See</i> Decl. of Allen Owens (Navy) ¶ 3 (filed herewith).</p>
DTX 0625	NAVY-ADS-0000315296 – NAVY-ADS-0000315374	<p>Email (Nov. 1, 2018) From: A. Lacroce To: J. O'sullivan Subject: Navy Advertising Contract Attach: N00189-15-z024</p>	<p>The United States requests that the highlighted text be redacted because it contains the agency's unit and extended pricing for the non-cost contract line items in the current contract and the 2015 awarded contract. The Navy's practice is not to share unit or extended pricing for this contract on publicly accessible government portals such as SAM.gov or in response to FOIA requests. As the Navy anticipates re-procuring these contracts within the next 12 months, disclosing this information publicly risks harm to the integrity of the procurement process. For example, in DTX 0625, the "Research, Strategic Planning, Program Development and Assessment" rate indicated on page 5 of 78 is the rate that the Navy has determine to be fair and reasonable for that level of work. If another potential offeror learned this information in advance of the upcoming re-compete process, there is risk that the Navy may not receive the offeror's best</p>

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			available offer from a cost/price perspective, thereby increasing overall costs to the Navy, and the taxpayer, for advertising and marketing services. <i>See</i> Decl. of Allen Owens (Navy) ¶ 4.
DTX 1090	NAVY-ADS-0000219026 – NAVY-ADS-0000219173	Email (Apr. 22, 2021) From: A. Owens To: D. Curry-Stewart Subject: FW: Award of M&A contract Attach: Advertising Services Contract Attachments 1-13 dtd Jan 2020 rev 5	The United States requests that the highlighted text be redacted because it contains the agency’s unit and extended pricing for the non-cost contract line items in the current contract and the 2015 awarded contract. The Navy’s practice is not to share unit or extended pricing for this contract on publicly accessible government portals such as SAM.gov or in response to FOIA requests. As the Navy anticipates re-procuring these contracts within the next 12 months, disclosing this information publicly risks harm to the integrity of the procurement process. For example, in DTX 0625, the “Research, Strategic Planning, Program Development and Assessment” rate indicated on page 5 of 78 is the rate that the Navy has determine to be fair and reasonable for that level of work. If another potential offeror learned this information in advance of the upcoming re-compete process, there is risk that the Navy may not receive the offeror’s best available offer from a cost/price perspective, thereby increasing overall costs to the Navy, and the taxpayer, for

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			advertising and marketing services. <i>See</i> Decl. of Allen Owens (Navy) ¶ 4.
DTX 1088	NAVY-ADS-0000256935 – NAVY-ADS-0000257031	Order Form (Apr. 19, 2021) Issued by: Navsup FLC Norfolk Philadelphia Office Deliver to: Navy Recruiting Command	The United States requests that the highlighted text be redacted because it contains the agency’s unit and extended pricing for the non-cost contract line items in the current contract and the 2015 awarded contract. The Navy’s practice is not to share unit or extended pricing for this contract on publicly accessible government portals such as SAM.gov or in response to FOIA requests. As the Navy anticipates re-procuring these contracts within the next 12 months, disclosing this information publicly risks harm to the integrity of the procurement process. For example, in DTX 0625, the “Research, Strategic Planning, Program Development and Assessment” rate indicated on page 5 of 78 is the rate that the Navy has determine to be fair and reasonable for that level of work. If another potential offeror learned this information in advance of the upcoming re-compete process, there is risk that the Navy may not receive the offeror’s best available offer from a cost/price perspective, thereby increasing overall costs to the Navy, and the taxpayer, for advertising and marketing services. <i>See</i> Decl. of Allen Owens (Navy) ¶ 4.

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DTX 1081	NAVY-ADS-0000012235 – NAVY-ADS-0000012407	Email (Mar. 19, 2021) From: C. Edmondson To: A. Lacroce Subject: [Non-DoD Source] Request for Proposal (RFP) N00189-20-R-Z020 VML Y&R Proposal Volumes I and II Attach: Navy Doc - Navy Marketing and Advertising (M&A Program)	The United States requests that DTX 1081 (beginning with Bates number NAVY-ADS-000012235) be sealed in full. The exhibit is a transmittal email and attachments containing the Navy’s current advertising contractor’s technical and price proposal. As prescribed by law and the Federal Acquisition Regulations, agencies cannot release contractor bid or proposal information, which typically includes proprietary information about how a contractor proposes to perform under the contract, unless such information is incorporated into the award of the contract or incorporated by reference. 41 USC 4702; FAR 3.104-4. Navy did not incorporate these documents by reference and accordingly, these documents should be kept under seal in full. Publicly disclosing this information would impair Navy function and operation by undermining the ability of the Navy to contract with advertising agencies in the future. Additionally, it would allow future potential bidders to see rates that Navy deems fair and reasonable, thereby harming the Navy by potentially preventing the Navy from obtaining the lowest costs in future procurements. <i>See</i> Decl. of Allen Owens (Navy) ¶ 5.

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DTX 1174	NAVY-ADS-0000249484 – NAVY-ADS-0000249522	Y&R Digital Media Bill (Dec. 20, 2021) Client: Navy	The United States requests that the highlighted text be redacted because the exhibits beginning with Bates number NAVY-ADS-0000249484 (an excerpt of DTX 1174), NAVY-ADS-0000374151 (an excerpt of DTX 1369), NAVY-ADS-0000250171 (an excerpt of DTX 1298), and NAVY-ADS-0000373978 (an excerpt of DTX 1392) are copies of the contractor’s digital media bill and subcontracting invoices. These invoices include amounts spent on each third-party vendor, which not only allows for deducing the contractor’s strategy for the allocation of funding and selection of media placement, but also provides the Navy’s sensitive budgetary information and allows for deducing the Navy’s marketing strategy. Disclosure would harm the Navy by allowing other vendors to see the rates Navy is paying competitors, potentially preventing the Navy from obtaining the lowest costs in future procurements. <i>See</i> Decl. of Allen Owens (Navy) ¶ 6.
DTX 1369	NAVY-ADS-0000374151 – NAVY-ADS-0000374171	Y&R Digital Media Bill (Oct. 24, 2022) Client: NV0 Navy Invoice: 2A1307M	The United States requests that the highlighted text be redacted because the exhibits beginning with Bates number NAVY-ADS-0000249484 (an excerpt of DTX 1174), NAVY-ADS-0000374151 (an excerpt of DTX 1369), NAVY-ADS-0000250171 (an excerpt of DTX 1298),

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			and NAVY-ADS-0000373978 (an excerpt of DTX 1392) are copies of the contractor’s digital media bill and subcontracting invoices. These invoices include amounts spent on each third-party vendor, which not only allows for deducing the contractor’s strategy for the allocation of funding and selection of media placement, but also provides the Navy’s sensitive budgetary information and allows for deducing the Navy’s marketing strategy. Disclosure would harm the Navy by allowing other vendors to see the rates Navy is paying competitors, potentially preventing the Navy from obtaining the lowest costs in future procurements. <i>See</i> Decl. of Allen Owens (Navy) ¶ 6.
DTX 1298	NAVY-ADS-0000250171 – NAVY-ADS-0000250227	Navy Invoice (June 20, 2022) Y&R Digital Media Bill	The United States requests that the highlighted text be redacted because the exhibits beginning with Bates number NAVY-ADS-0000249484 (an excerpt of DTX 1174), NAVY-ADS-0000374151 (an excerpt of DTX 1369), NAVY-ADS-0000250171 (an excerpt of DTX 1298), and NAVY-ADS-0000373978 (an excerpt of DTX 1392) are copies of the contractor’s digital media bill and subcontracting invoices. These invoices include amounts spent on each third-party vendor, which not only allows for deducing the contractor’s strategy for the

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			allocation of funding and selection of media placement, but also provides the Navy’s sensitive budgetary information and allows for deducing the Navy’s marketing strategy. Disclosure would harm the Navy by allowing other vendors to see the rates Navy is paying competitors, potentially preventing the Navy from obtaining the lowest costs in future procurements. <i>See</i> Decl. of Allen Owens (Navy) ¶ 6.
DTX 1392	NAVY-ADS-0000373978 – NAVY-ADS-0000374145	Y&R Digital Media Bill (Nov. 21, 2022) Client: NV0 Navy Invoice: 2B1354M1	The United States requests that the highlighted text be redacted because the exhibits beginning with Bates number NAVY-ADS-0000249484 (an excerpt of DTX 1174), NAVY-ADS-0000374151 (an excerpt of DTX 1369), NAVY-ADS-0000250171 (an excerpt of DTX 1298), and NAVY-ADS-0000373978 (an excerpt of DTX 1392) are copies of the contractor’s digital media bill and subcontracting invoices. These invoices include amounts spent on each third-party vendor, which not only allows for deducing the contractor’s strategy for the allocation of funding and selection of media placement, but also provides the Navy’s sensitive budgetary information and allows for deducing the Navy’s marketing strategy. Disclosure would harm the Navy by allowing other vendors to see the rates Navy is paying

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			competitors, potentially preventing the Navy from obtaining the lowest costs in future procurements. <i>See</i> Decl. of Allen Owens (Navy) ¶ 6.
DTX 1416	NAVY-ADS-0000029448 – NAVY-ADS-0000029525	Email (Dec. 16, 2022) From: B. Mason To: A. Owens, P. Garlinghouse, L. Eastwood, et al. CC: A. Paige-Powers, et al. Subject: TNP Presentation of Q2 Tactical Media Plan Attach: Navy Feb-May Tactical Medi109a - Final	The United States requests that the highlighted text be redacted because it contains the advertising agency’s recommended strategies to address Navy requirements for media purchases to maximize digital media engagement focused on Navy strategy to engage specific ages, demographics, categories, rates, and type of recruits. Additionally, these documents contain proprietary research on which the recommendations are based. The contractor identifies the recommended partners, timing, and amount given the Navy’s available funding for the media purchase. This information should be redacted as that strategy for the allocation of funding and selection of media placement is proprietary to the Navy’s marketing strategy, and release of this information would also allow other vendors to see the rates that Navy is paying competitors, thereby harming the Navy by potentially preventing the Navy from obtaining the lowest costs in future procurements. The pricing received per click, impression, etc. in the CPM is also proprietary for each recommended partner as the

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			<p>advertising contractor receives a different rate card or pricing from many of these partners that can be different than what is offered to a standard purchaser. If disclosed, the discount for each metric (i.e. CPM, etc.) could be identified by other purchasers, who could adjust their proposals to this rate rather than their actual available pricing, skewing the pricing analysis for a subsequent procurement action. This disclosure could adversely impact the Government’s ability to independently evaluate those offerors’ competency, thoroughness, and capability and overall value per metric during the technical and/or pricing evaluation of any follow-on requirement for this or similar services. <i>See</i> Decl. of Allen Owens (Navy) ¶ 7.</p>
DTX 1391	NAVY-ADS-0000033360 – NAVY-ADS-0000033471	<p>Meeting Invite From: A. Owens To: S. Howard Location: Microsoft Team Meeting Start: 11/17/2022</p>	<p>The United States requests that the highlighted text be redacted because it contains the advertising agency’s recommended strategies to address Navy requirements for media purchases to maximize digital media engagement focused on Navy strategy to engage specific ages, demographics, categories, rates, and type of recruits. Additionally, these documents contain proprietary research on which the recommendations are based. The contractor identifies the</p>

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			<p>recommended partners, timing, and amount given the Navy’s available funding for the media purchase. This information should be redacted as that strategy for the allocation of funding and selection of media placement is proprietary to the Navy’s marketing strategy, and release of this information would also allow other vendors to see the rates that Navy is paying competitors, thereby harming the Navy by potentially preventing the Navy from obtaining the lowest costs in future procurements. The pricing received per click, impression, etc. in the CPM is also proprietary for each recommended partner as the advertising contractor receives a different rate card or pricing from many of these partners that can be different than what is offered to a standard purchaser. If disclosed, the discount for each metric (i.e. CPM, etc.) could be identified by other purchasers, who could adjust their proposals to this rate rather than their actual available pricing, skewing the pricing analysis for a subsequent procurement action. This disclosure could adversely impact the Government’s ability to independently evaluate those offerors’ competency, thoroughness, and capability and overall value per metric during the technical</p>

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			and/or pricing evaluation of any follow-on requirement for this or similar services. <i>See</i> Decl. of Allen Owens (Navy) ¶ 7.
DTX 1094	NAVY-ADS-000019114 – NAVY-ADS-000019182	Email (May 21, 2021) From: P. Garlinghouse To: P. Garlinghouse, Navy Team, A. Owens, S. Milliet, S. Leslie, A. Paige-Powers Subject: June/July Media Plan Recommendation Attach: Navy Tactical Reco June-July Final	The United States requests that the highlighted text be redacted because it contains the advertising agency’s recommended strategies to address Navy requirements for media purchases to maximize digital media engagement focused on Navy strategy to engage specific ages, demographics, categories, rates, and type of recruits. Additionally, these documents contain proprietary research on which the recommendations are based. The contractor identifies the recommended partners, timing, and amount given the Navy’s available funding for the media purchase. This information should be redacted as that strategy for the allocation of funding and selection of media placement is proprietary to the Navy’s marketing strategy, and release of this information would also allow other vendors to see the rates that Navy is paying competitors, thereby harming the Navy by potentially preventing the Navy from obtaining the lowest costs in future procurements. The pricing received per click, impression, etc. in the CPM is also proprietary for each recommended partner as the

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			<p>advertising contractor receives a different rate card or pricing from many of these partners that can be different than what is offered to a standard purchaser. If disclosed, the discount for each metric (i.e. CPM, etc.) could be identified by other purchasers, who could adjust their proposals to this rate rather than their actual available pricing, skewing the pricing analysis for a subsequent procurement action. This disclosure could adversely impact the Government’s ability to independently evaluate those offerors’ competency, thoroughness, and capability and overall value per metric during the technical and/or pricing evaluation of any follow-on requirement for this or similar services. <i>See</i> Decl. of Allen Owens (Navy) ¶ 7.</p>
DTX 1326	NAVY-ADS-000045197 – NAVY-ADS-000045206	<p>Email (Aug. 22, 2022) From: A. Owens To: S. Muoio CC: D. Curry-Stewart, L. Skelton, R. Peters, N. Wachter, S. Milliet Subject: Q4 2022 Navy Media Incremental Recommendation Attach: Navy 4Q22 Tactical Media Reco</p>	<p>The United States requests that the highlighted text be redacted because it contains the advertising agency’s recommended strategies to address Navy requirements for media purchases to maximize digital media engagement focused on Navy strategy to engage specific ages, demographics, categories, rates, and type of recruits. Additionally, these documents contain proprietary research on which the recommendations are based. The contractor identifies the</p>

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			<p>recommended partners, timing, and amount given the Navy’s available funding for the media purchase. This information should be redacted as that strategy for the allocation of funding and selection of media placement is proprietary to the Navy’s marketing strategy, and release of this information would also allow other vendors to see the rates that Navy is paying competitors, thereby harming the Navy by potentially preventing the Navy from obtaining the lowest costs in future procurements. The pricing received per click, impression, etc. in the CPM is also proprietary for each recommended partner as the advertising contractor receives a different rate card or pricing from many of these partners that can be different than what is offered to a standard purchaser. If disclosed, the discount for each metric (i.e. CPM, etc.) could be identified by other purchasers, who could adjust their proposals to this rate rather than their actual available pricing, skewing the pricing analysis for a subsequent procurement action. This disclosure could adversely impact the Government’s ability to independently evaluate those offerors’ competency, thoroughness, and capability and overall value per metric during the technical</p>

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			and/or pricing evaluation of any follow-on requirement for this or similar services. <i>See</i> Decl. of Allen Owens (Navy) ¶ 7.
NHTSA Documents			
DTX 1368	NHTSA-ADS-0000344712 – NHTSA-ADS-0000344848	Email (Oct. 20, 2022) From: S. McMeen To: J. Vallese CC: J. Syner Subject: OSt Follow-up Questions and Advertising Updated Attach: Media Services for Traffic Safety Public	The United States requests that the highlighted text be redacted because it contains provisional indirect cost rates at NHTSA-ADS-0000344729 and NHTSA-ADS-0000344763, respectively. Disclosure of this information may negatively impact future procurement processes for similar services. Knowledge that such rates are subject to disclosure would have a discouraging effect on potential contractors considering whether to submit proposals in response to solicitations, out of concern that their rates may later be disclosed. This would harm NHTSA by resulting in a less robust and competitive procurement process. <i>See</i> Decl. of Stephen Hench (NHTSA) ¶ 3 (filed herewith).

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USPS Documents			
DTX 0690	USPS-ADS-0000183870 – USPS-ADS-0000183871 USPS-ADS-0000196973 – USPS-ADS-0000196974	For the document with beginning Bates number USPS-ADS-0000196973: Email (Sep. 24, 2020) From: L. Catucci To: B. Pasco, C. Karpenko CC: M. Knopf, K. Lockhart Subject: [EXTERNAL] RE: VBM Display and Digital Video Plan Update	The United States requests that the highlighted text be redacted because it contains recent pricing information the disclosure of which would harm USPS’s ability to compete in the market. <i>See</i> Decl. of C. Karpenko (USPS) ¶ 3 (filed herewith).
DTX 1004	USPS-ADS-0000196973 – USPS-ADS-0000196974	Email (Sep. 24, 2020) From: L. Catucci To: B. Pasco, C. Karpenko CC: M. Knopf, K. Lockhart Subject: [EXTERNAL] RE: VBM Display and Digital Video Plan Update	The United States requests that the highlighted text be redacted because it contains recent pricing information the disclosure of which would harm USPS’s ability to compete in the market. <i>See</i> Decl. of C. Karpenko (USPS) ¶¶ 3, 4.
DTX 1176	USPS-ADS-0000529112 – USPS-ADS-0000529186	Order Solicitation Offer/Award (Dec. 12, 2021) Issued by: Advertising & Creative Services Professional & Technical Service CMC Supplier: Universal McCann Worldwide Inc.	The United States requests that the highlighted text be redacted because it contains (1) specific terms, rates, and fees paid by USPS to its contractor whose disclosure would significantly impair USPS’s ability to negotiate future contracts with other suppliers, and (2) the cellphone number of a USPS employee, in which the employee has a strong privacy interest and USPS has a strong interest in preventing harassment of employees at their homes. <i>See</i> Decl. of C. Karpenko (USPS) ¶ 5.
DTX 1197	USPS-ADS-0000529380 – USPS-ADS-0000529412	Order Solicitation Offer/Award (Jan. 2021) Issued by: Advertising & Creative	The United States requests that the highlighted text be redacted because it contains (1) planned advertising spend

Exhibit No.	Beg Bates–End Bates	Description	Basis for Sealing
		Services Professional & Technical Service CMC Supplier: Universal McCann Worldwide Inc.	between April 2022 and March 2023 across different advertising channels, the disclosure of which would harm USPS’s ability to compete in the market, and (2) the cellphone number of a USPS employee, in which the employee has a strong privacy interest and USPS has a strong interest in preventing harassment of employees at their homes. <i>See</i> Decl. of C. Karpenko (USPS) ¶ 6.
DTX 1222	USPS-ADS-0000669680 – USPS-ADS-0000669715	Email (Feb. 17, 2022) From: L. Ernst To: B. Pasco CC: M. Knopf, S. Starr, M. Doyle, T. Camp, S. Das, M. Bottenberg Subject: [EXTERNAL] Billing - FY'22 Q2 JFM - February Attach: 1USP Master Invoice 2ACCSR-21-C-0016 0222 billing package	The United States requests that the highlighted text be redacted because it contains recent payment information to advertising vendors whose disclosure would harm USPS’s ability to compete in the market. <i>See</i> Decl. of C. Karpenko (USPS) ¶ 7.
DTX 1237	USPS-ADS-0000592851 – USPS-ADS-0000592863	Email (Mar. 29, 2022) From: M. Guilfoil To: K. Pompanella, M. Judkins, P. Kallat CC: K. Willins, S. Chang, C. Karpenko, B. Pasco, S. Holman, S. Monteith Subject: RE: OPM - Universal McCann - est \$137M Attach: Order Placement - UM Year 2.1	The United States requests that the highlighted text be redacted because it contains (1) excerpts and summaries of the confidential information described with respect to DTX 1197, the disclosure of which would harm USPS’s ability to compete in the market, and (2) the cellphone number of a USPS employee, in which the employee has a strong privacy interest and USPS has a strong interest in preventing harassment of employees at their homes. <i>See</i> Decl. of C. Karpenko (USPS) ¶¶ 6, 8.

Exhibit No.	Beg Bates–End Bates	Description	Basis for Sealing
DTX 1251	USPS-ADS-0000016395 – USPS-ADS-0000016463	Email (Apr. 26, 2022) From: M. Knopf To: C. Karpenko, S. Holman CC: F. Jackson, R. Hines, Z. Merrifeld, L. Catucci, et al. Subject: USPS FY'21 MMM & Impact on Equity Attach: USPS MMM Feb-Sep. 21' Deck Draft	The United States requests that the highlighted text be redacted because it contains detailed analyses, spending on advertising campaigns and channels, and recommendations, the disclosure of which would significantly impair USPS's ability to compete in the market. Decl. of C. Karpenko (USPS) ¶ 9.
DTX 1340	USPS-ADS-0000620144 – USPS-ADS-0000620145	Email (Sep. 14, 2022) From: B. Pasco To: L. Ernst CC: J. Tapia Subject: Avoid Surcharge Optimization	The United States requests that the highlighted text be redacted because it contains (1) detailed information regarding a shift in advertising spending strategy as well as the anticipated results, the disclosure of which would harm USPS's ability to compete in the market, and (2) the cellphone number of a USPS employee, in which the employee has a strong privacy interest and USPS has a strong interest in preventing harassment of employees at their homes. <i>See</i> Decl. of C. Karpenko (USPS) ¶ 10.
DTX 1341	USPS-ADS-0000104815 – USPS-ADS-0000104839	Email (Sep. 14, 2022) From: M. Knopf To: K. Wilins, C. Karpenko, K. Pompanella, P. Kallat, L. Ernst, C. Winters, F. Corcoran, S. Starr, B. Pasco, S. Chang, A. Marlatt, L. Catucci Subject: RE: Hold for Universal McCann - Key Supplier Meeting Attach: 2022 YE Review UM Portion 9.14.22	The United States requests that the highlighted text be redacted because it contains detailed analyses of USPS's ongoing advertising campaigns, including details regarding spending for specific campaigns in specific channels, the disclosure of which would be significantly detrimental to USPS's ability to compete in the market because such information would allow USPS's

Exhibit No.	Beg Bates–End Bates	Description	Basis for Sealing
			rivals to effectively counter USPS’s advertising strategy. <i>See</i> Decl. of C. Karpenko (USPS) ¶ 11.
DTX 1351	USPS-ADS-0000623759 – USPS-ADS-0000623841	Email (Sep. 20, 2022) From: L. Ernst To: B. Pasco CC: M. Knopf, D. McGregor, S. Zavala, T. Camp, L. Ernst, S. Starr, B. Pasco, M. Bottenberg Subject: [EXTERNAL] Billing - FY'22 Q4 JAS - September Attach: 1USP Master Invoice Billing Package 9.20 FY'22 Workbook	The United States requests that the highlighted text be redacted because it contains specific amounts owed to specific advertising vendors for different campaigns, the disclosure of which would harm USPS’s ability to compete in the market. <i>See</i> Decl. of C. Karpenko (USPS) ¶ 12.
DTX 1463	USPS-ADS-000902290 – USPS-ADS-000902373	Email (Jan. 17, 2023) From: S. Chang To: C. Karpenko CC: M. Votsch, M. Bottenberg, S. Boardman, M. Weaver Subject: RE: UM Contract Attach: Fuliy Executed; 2022 Specialty Services Addendum; USPS Matterkind Lead Gen - OBM Scope	The United States requests that the highlighted text be redacted because it contains the document DTX 1176 and holds the same confidential information as that document. <i>See</i> Decl. of C. Karpenko (USPS) ¶¶ 5, 13.
DTX 1483	USPS-ADS-0000042055 – USPS-ADS-0000042181	Email (Feb. 14, 2023) From: A. Meehan To: C. Karpenko, K. Copeland, T. Simmons, M. Bottenberg, R. Hines, S. Starr, S. Holman, T. Poling CC: N. Torres, M. Knopf, L. Catucci, G. Scarpa, at al. Subject: RE: FY'22 DFA/Connect Recap Attach: FY22 USPS DFA_Connect Wrap Up 2.14	The United States requests that the highlighted text be redacted because it contains a detailed summary of 2022 advertising spending, the efficacy of that spending across different channels, and recommendations for future spending, the disclosure of which would significantly harm USPS’s ability to compete in the market because it would enable USPS’s rivals to disrupt USPS’s

Exhibit No.	Beg Bates–End Bates	Description	Basis for Sealing
			advertising strategy with counterprogramming. <i>See</i> Decl. of C. Karpenko (USPS) ¶ 14.